



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NR
F. #2020R0338

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 15, 2020

By Email and ECF

Jean D. Barrett, Esq.
Ruhnke & Barrett
47 Park Street
Montclair, NJ 07042

Jeremy Gutman, Esq.
40 Fulton Street, 23rd Floor
New York, New York 10038

Re: **United States v. Kent Bulloch and William Young, Sr.**
Criminal Docket No. 20-181(PK)

Dear Ms. Barrett and Mr. Gutman:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

A. Documents and Tangible Objects

The government hereby provides the following materials:

- Draft transcripts of four telephone calls on or about April 21-23, 2020 between William Young, Sr., Kent Bulloch and an FBI agent acting in undercover capacity; and
- Body camera video taken in conjunction with Kent Bulloch's arrest.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/ Nathan Reilly
Nathan Reilly
Assistant U.S. Attorney
(718) 254-6196

Enclosures

cc: Clerk of the Court (PK)) (by ECF) (without enclosures)